

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

**DEBTORS' MOTION FOR LEAVE TO FILE
DEBTORS' REPLY TO RESPONSE AND SUPPLEMENTAL RESPONSE FILED BY
PETER PEARSON TO THE FIFTH OMNIBUS OBJECTION TO CLAIMS**

The above-captioned debtors and debtors in possession (collectively, the “*Debtors*”) hereby request authority pursuant to Del.Bankr.LR 9006-1(d) to file a reply in further support of the *Debtors’ Fifth Omnibus Objection to Claims* (the “Claim Objection”) (Docket No. 5527) and in response to Peter Pearson’s response to the Claim Objection (the “Response”) (Docket No. 5637) and supplemental response to the Claim Objection (the “Supplemental Response”) (Docket No. 5685). The Claim Objection is currently scheduled for hearing before

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darez Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homeo International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

the Court on March 21, 2005 at 12:00 p.m.

Given the dollar amount of the claim at issue (\$741,600), the Debtors seek authority to file their reply (the "Reply") to the Response and Supplemental Response to more clearly frame the bases of their objections to Mr. Pearson's claim and to articulate the controlling legal standards. The Debtors respectfully submit that the relief requested herein will not only benefit the Court in its review of the dispute before it in connection with Mr. Pearson's claim, but also Mr. Pearson, as he will have a better understanding as to why the Debtors are seeking to expunge his claim.

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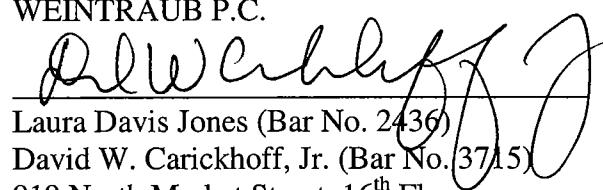
WHEREFORE, the Debtors respectfully request the entry of an Order granting it authority to file the Reply, a copy of which is attached hereto as Exhibit 1.

Dated: March 4, 2005

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Co-Counsel for the Debtors and Debtors in Possession

SO ORDERED this ___ day
of March, 2005

The Honorable Judith K. Fitzgerald
United States Bankruptcy Judge